



SoCalBio

Southern California Biomedical Council

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The Southern California Biomedical Council (SoCalBio) is a non-profit trade association. The mission of SoCalBio is to promote and support biotech, medtech and digital health industries in Los Angeles, Orange County, the Inland Empire and the Gold Coast of California for job creation and economic growth.

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Ahmed A. Enany, President and CEO

January 15, 2016

Pharmaceutical Working Group
c/o Angelo J. Bellomo, REHS, QEP,
Deputy Director for Health Protection
Los Angeles County
5050 Commerce Drive
Baldwin Park, CA 91706

RE: Pharmaceuticals and Sharps Collection and Disposal Stewardship Ordinance (OPPOSE)

Dear Mr. Bellomo

On behalf of the Southern Californian Biomedical Council (SoCalBio), I am writing in opposition to the Los Angeles County's "Collection and Disposal Stewardship Ordinance for Recycling Drugs and Sharps." SoCalBio is the trade association of the bioscience and digital health industries in the Greater Los Angeles Metro Area. There are about 1000 bioscience companies in our region employing more than 100,000 people. Nearly half of these bioscience firms and employees are located within the boundaries of Los Angeles County.

SoCalBio now has over 350 biotech, device, IVD and digital health companies that support and sponsor its activities. Membership in SoCalBio also includes research and educational institutions, investors and allied service providers. Since its founding through Rebuild LA, the organization continues to provide needed services to many local firms in gaining access to sources of capital, potential partners and other resources. SoCalBio also promotes technology transfer and workforce training, while informing policy makers and the public at-large about the benefits of the region's bioscience industry.

The draft ordinance's stated goals of preventing the abuse of prescription medicine and the proper, environmentally-sound disposal of sharps and unused drugs are laudable. However, the ordinance as drafted will be difficult to administer, and places an unprecedented burden on LA County's drug and device manufacturers.

In our opinion and judging from SoCalBio member company feedback, the ordinance – when implemented – may drive manufacturers out of Los Angeles County at a time when we are struggling to maintain and grow the bioscience industry cluster in the County for economic development and job creation. Lastly, the program contemplated in the ordinance may not achieve its stated goals.

It is true that a need exists for the proper disposal of sharps, such as needles and lancets, and partially used medicines. Medicines flushed down the toilet or in drains pass through the sewer system and eventually enter our streams, lakes, and rivers. Medicines and synthetic hormones have been detected in trace amounts in water bodies, which could lead to increased bacterial resistance to antibiotics and interference with growth and reproduction in aquatic organisms.

But, it is also true that currently there are only six large bin collection centers in Los Angeles County that accept sharps and medicines, all at sheriff stations. People who have attempted to use them often find that they are not properly emptied or maintained, making it difficult for the average person to find a bin that is not already packed, even if they knew of the locations of such bins. While free quart-sized sharps containers can be obtained and dropped off at a number of locations throughout the county, many of them have limited days and hours of operation, and they are only for sharps.

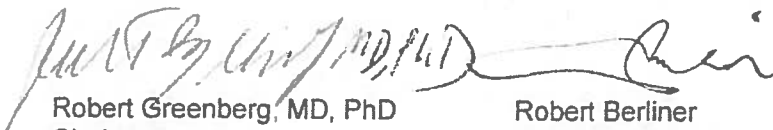
However, the draft proposal is not the way to solve these problems. It has provisions calling for specific costly actions by a host of businesses and the payment of yet to be determined fees. What is being proposed is unnecessarily complex and poses an undue burden on businesses engaged in pharmaceutical and device manufacturing. In fact, the ordinance sends a message to the outside world that Los Angeles is not a business friendly environment, particularly for companies engaged in manufacturing activities.

Instead of the county establishing another bureaucracy to run and oversee this program, it would be much preferable to invest in strengthening the existing infrastructure for recycling. The County should place a substantial number of additional large disposal bins at more accessible locations (police stations and/or fire stations of cities within the county, not just sheriff stations) and use the manpower that otherwise would go into running the proposed program to instead be engaged in the efficient pickup and disposal of medicines and sharps at current and added bins. In addition, the County can partner with drug retailers, such as CVS, that put in place systems for collecting and disposing of medicines and medical devices.

The only thing wrong with the present system is that there are not enough recycling bins, not enough attention being paid to them, and no sufficient publicity about them. Nobody appears to be overseeing the prompt pick-up and disposal of the contents of the existing bins. What is needed is to expand the current method of providing large bins at strategic locations, overseeing pick-ups and disposal, and publicizing the program. All of the above can be accomplished at a fraction of the cost of the proposed program in the draft ordinance.

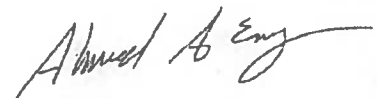
In conclusion, our member companies recognize that improper drug or sharp disposal is a real problem. SoCalBio and member companies are therefore happy to work with the Los Angeles County and various stakeholders to provide education and outreach where appropriate to prevent prescription drugs from falling into the wrong hands and ensure proper disposal of sharps.

Sincerely,



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